

EXHIBIT B

From: [Jacobs, Edward J.](#)
To: [Helen Chaitman](#)
Cc: [Amy Sanchez](#); [Sheehan, David J.](#); [Cremona, Nicholas](#); [Greg Dexter](#); [Sarah Howell](#)
Subject: RE: Madoff.Clawback Notice of Subpoena of Steve Friedman
Date: Friday, April 07, 2017 2:19:37 PM

Helen,

Your subpoenas also include a document demand. You stated in writing that you refused to hold those requests in abeyance, and that while you would wait and schedule depositions after the hearing, you were nonetheless "moving forward with the subpoenas." Please forward the subpoenas as served and copy us on all communications with opposing counsel. The only reason we are having to wait on our motion to quash is the Court's scheduling difficulties. In the meantime, we told the Court we would let it know if you are cooperating with the Court's schedule by holding the subpoenas in abeyance. We would greatly appreciate it if you would stop playing these games and provide a clear answer on the status of the subpoenas, including the document demands, return dates, and your efforts to inform the subpoenaed parties that there is a motion to quash pending and a hearing on that motion scheduled. Please provide that information without further delay. We have been asking for it for over a week now.

Regards,
Ted

From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Friday, April 07, 2017 1:59 PM
To: Jacobs, Edward J.
Cc: Amy Sanchez; Sheehan, David J.; Cremona, Nicholas; Greg Dexter; Sarah Howell
Subject: Re: Madoff.Clawback Notice of Subpoena of Steve Friedman

We have told everyone that we have subpoenaed that we will set up dates for them in the future. We did that at your request.

Sent from my iPhone

On Apr 7, 2017, at 7:46 PM, Jacobs, Edward J. <ejacobs@bakerlaw.com> wrote:

Thank you Helen.

Please forward copies of the subpoenas as served so we (and the Court) can see what you have set as the return dates. This is critical especially now that you are stating no one at your firm is available to cover the hearing on our motion to quash next week.

Regards,
Ted

From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Friday, April 07, 2017 12:06 PM
To: Jacobs, Edward J.; Amy Sanchez; Sheehan, David J.; Cremona, Nicholas

Cc: Greg Dexter; Sarah Howell
Subject: RE: Madoff.Clawback Notice of Subpoena of Steve Friedman

The following people have been served to date:

Robert Gutman
Steve Friedman
Hendrick Voigt
Neilay Methah
Zafer Barutcuoglu
Jamie Lynn Rosenberger

Helen Davis Chaitman
Chaitman LLP
465 Park Avenue
New York, New York 10022
hchaitman@chaitmanllp.com
Cell: (908) 303-4568
Fax: (888) 759-1114

From: Helen Chaitman
Sent: Friday, April 07, 2017 3:20 AM
To: Jacobs, Edward J. <ejacobs@bakerlaw.com>; Amy Sanchez <asanchez@chaitmanllp.com>; Sheehan, David J. <dsheehan@bakerlaw.com>; Cremona, Nicholas <ncremona@bakerlaw.com>
Cc: Greg Dexter <gdexter@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>
Subject: RE: Madoff.Clawback Notice of Subpoena of Steve Friedman

Ted: At your request, we are not proceeding with any of the subpoenaed discovery until we resolve the issues you have raised with Judge Bernstein. However, as I told you, the process servers are continuing to serve the subpoenas. I will have my office get in touch with the process servers to determine the precise status of what they are doing, but it should not make any difference to you. I'm not sure what your concern is.

Helen Davis Chaitman
Chaitman LLP
465 Park Avenue
New York, New York 10022
hchaitman@chaitmanllp.com
Cell: (908) 303-4568
Fax: (888) 759-1114

From: Jacobs, Edward J. [<mailto:ejacobs@bakerlaw.com>]
Sent: Thursday, April 06, 2017 8:44 PM
To: Amy Sanchez <asanchez@chaitmanllp.com>; Sheehan, David J.

<dsheehan@bakerlaw.com>; Cremona, Nicholas <ncremona@bakerlaw.com>

Cc: Greg Dexter <gdexter@chaitmanllp.com>; Helen Chaitman

<hchaitman@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>

Subject: Re: Madoff.Clawback Notice of Subpoena of Steve Friedman

Please advise as to the status of the subpoenas. I don't believe that Judge Bernstein will appreciate that you have withheld this information while a judicial hearing to quash is pending.

Regards,
Ted

On Apr 3, 2017, at 1:20 PM, Jacobs, Edward J. <ejacobs@bakerlaw.com> wrote:

Helen,

Please send the subpoenas as served, which should have been forwarded immediately when I requested them last Thursday. Also please forward any responses and copy me on all communications with the recipients and/or their counsel.

Regards,
Ted

From: Jacobs, Edward J.

Sent: Thursday, March 30, 2017 4:55 PM

To: Amy Sanchez; Sheehan, David J.; Cremona, Nicholas

Cc: Greg Dexter; Helen Chaitman; Sarah Howell

Subject: RE: Madoff.Clawback Notice of Subpoena of Steve Friedman

Amy,

Thank you. Can you please also provide copies of all subpoenas that have been served as well? We are entitled to see the return dates and whether any information has been modified from the noticed versions.

Regards,
Ted

From: Amy Sanchez [<mailto:asanchez@chaitmanllp.com>]

Sent: Thursday, March 30, 2017 2:32 PM

To: Sheehan, David J.; Cremona, Nicholas; Jacobs, Edward J.

Cc: Greg Dexter; Helen Chaitman; Sarah Howell

Subject: RE: Madoff.Clawback Notice of Subpoena of Steve Friedman

Dear Counsel,

Please find attached proof of service of the Notice of Subpoena Steve Friedman.

Thank you,

Amy Watson Sanchez
Paralegal
Chaitman LLP
465 Park Avenue
New York, New York 10022
asanchez@chaitmanllp.com
Office: (888) 759-1114, ext 10

From: Amy Sanchez
Sent: Wednesday, March 15, 2017 9:06 PM
To: 'dsheehan@bakerlaw.com' <dsheehan@bakerlaw.com>;
'ncremona@bakerlaw.com' <ncremona@bakerlaw.com>; 'ejacobs@bakerlaw.com'
<ejacobs@bakerlaw.com>
Cc: Greg Dexter <gdexter@chaitmanllp.com>; Helen Chaitman
<hchaitman@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>
Subject: Madoff.Clawback Notice of Subpoena of Steve Friedman

Dear Counsel,

Attached, please find for service our Notice of Subpoena of Steve Friedman.

Thank you,

Amy Watson Sanchez
Paralegal
Chaitman LLP
465 Park Avenue
New York, New York 10022
asanchez@chaitmanllp.com
Office: (888) 759-1114, ext 10

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